

DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

WHO MUST FILE THE 2013 HAZARDOUS WASTE REPORT?

SITES REQUIRED TO FILE THE HAZARDOUS WASTE REPORT ...

You are required by Federal statute (mandatory reporting) to complete and file the 2013 Hazardous Waste Report (also known as the "Biennial Report") or your State's equivalent hazardous waste report if your site:

- Met the definition (see box below) of a RCRA Large Quantity Generator (LQG) during 2013; or
- Treated, stored, or disposed of RCRA hazardous wastes on-site during 2013.

If you are required to report, please determine WHICH FORMS TO SUBMIT AND WHAT TO REPORT.

DEFINITION OF A RCRA LARGE QUANTITY GENERATOR WHO MUST REPORT FOR CALENDAR YEAR 2013

A site is a RCRA Large Quantity Generator (LQG) for 2013 if the site met any of the following criteria:

- The site generated, in any single calendar month, 1,000 kg (2,200 lbs.) or more of RCRA non-acute hazardous waste; **or**
- The site generated, in an single calendar month, or accumulated at any time, more than 1 kg (2.2 lbs.) of RCRA acute hazardous waste; or
- The site generated, in any single calendar month, or accumulated at any time, more than 100 kg (220 lbs.) of spill cleanup material contaminated with RCRA acute hazardous waste.

Please Note:

- 1. Generators must total (or count) the quantity of all hazardous wastes generated per month. The regulations stating which hazardous wastes are counted in a generator's monthly quantity determination are found in 40 CFR 261.5(c) and (d).
- 2. You will report your current Hazardous Waste Generator status as of the date of submitting your 2013 Hazardous Waste Report on the Site ID Form in Item 10.A.1 Generator of Hazardous Waste. Your current status may be different from the status during the report year that requires you to file the Hazardous Waste Report.
- 3. Hazardous waste imported from a foreign country in 2013 must be counted in determining your generator status if your site is the U.S. Importer. This waste must be reported on the GM Form or the WR Form in your 2013 Hazardous Waste Report.
- 4. Some States, as a matter of State law, require other categories of generators to report as well. See the discussion under "State-specific Requirements" on page 10.

SITES WHO SHOULD NOT FILE THE HAZARDOUS WASTE REPORT ...

Do not file the 2013 Hazardous Waste Report if, during 2013, your site was not a RCRA Large Quantity Generator (did not meet any of the LQG criteria) **and** your site did not treat, store, or dispose of RCRA hazardous wastes on-site in waste management units subject to a RCRA operating permit.

If you are not required to report, you should notify us if your hazardous waste generator status has changed; please fill out the RCRA Subtitle C Site Identification Form and submit it to your State Office. See the Item-by-Item Instructions for information on filling out the Site Identification Form. Place an "X" in the box for Subsequent Notification in Item 1 – Reason for Submittal.

Do not file the 2013 Hazardous Waste Report if, during 2013, all of your hazardous waste was exported directly out of the U.S. to a foreign country. Facilities that export hazardous waste must file a separate Annual Report under 40 CFR 262.56.

WHAT'S NEW FOR 2013 ...

Below is a list of changes to the 2013 Hazardous Waste Report Instructions and Forms.

CONSOLIDATED MANAGEMENT METHOD CODES

Some management method codes have been consolidated in order to ease reporting. For example, previous codes H071 (chemical reduction), H073 (cyanide destruction), H075 (chemical oxidation), H076 (wet air oxidation) and H077 (other chemical precipitation) have all been consolidated under the new management method code H070 (chemical treatment). The management method codes for this 2013 reporting year have been mapped to the management method codes used for previous years in order to assist filers with the transition.

REVISED WASTE MINIMIZATION CODES

The waste minimization codes have been revised in order to assist filers with reporting their waste minimization activities. The new waste minimization codes identify when waste minimization activities occurred (whether initiated prior to the reporting year or during the reporting year) and also provide examples of types of waste minimization activities.

REVISED LANGUAGE FOR SOME SOURCE CODE DESCRIPTIONS

Editorial changes were made to the description of some source codes in order to improve clarity for filers. For example, G25 was changed from "hazardous waste management" to "treatment, disposal, or recycling of hazardous waste" in order to better communicate the meaning of this code.

REVISED NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS) CODES

In completing the 2013 Hazardous Waste Report, sites should use the new 2012 NAICS codes established by the U.S. Census Bureau. Significant changes were made to the NAICS codes in 2012. All sites should confirm their NAICS codes in the new 2012 NAICS code table, which can be found at http://www.census.gov/eos/www/naics.

WHERE DO I FIND MORE INFORMATION?

The 2013 Hazardous Waste Report Instructions and Form Booklet is found on the EPA's website: http://www.epa.gov/epawaste/inforesources/data/biennialreport/index.htm

WHEN IS THE DEADLINE FOR FILING?

Electronic Filing is due by March 1, 2014.

IS TRAINING AVAILABLE?

The North Carolina Hazardous Waste Section will schedule facility training on *Thursday, February 6, 2014* at the Hazardous Waste Section office located in the new Environment and Natural Resources Building (Green Square) at 217 West Jones Street, Room 1107 (1st Floor), Raleigh, NC – main phone #919-707-8200.

PRELIMINARY AGENDA:

- General Overview of 2013 Hazardous Waste Reporting Guidelines
- EPA Site Identification (Site ID) 8700-13 A/B Form
- Instructions for completing Form GM Waste Generation and Management
- Instructions for Completing Form WR Waste Received from Off Site
- Electronic filing Easitrak Demonstration
- Questions/Answers Session

Registration is required. Please note the registration link will be sent to all LQG/TSD facility contacts late 2013.

WHERE DO I FILE ELECTRONICALLY?

EPA encourages electronic reporting of your 2013 Hazardous Waste Report. For this purpose, the North Carolina Hazardous Waste Section has contracted with American Resource Management (ARM) to use their Waste Reporting Software Solutions System, *Easitrak*. *Easitrak* is a web-based, user friendly system designed to allow the regulated community to enter their 2013 Biennial Report for hazardous waste. Facilities must complete their Hazardous Waste Reports on-line using the following link: http://arminc.net

EASITRAK HELPFUL HINTS:

- You do not have to complete the report at one sitting. Before you log off, don't forget to SAVE your data.
- > Remember to allow for pop-up screens, otherwise you may not be able to go to the next step.
- When entering location/contact/mailing addresses, enter your zip code first. Then pick the correct city from the pop-up screen.
- For New Filers: If this is your first time filing, click the "Registration for Generator" and enter your facility EPA ID # and assign your own password. The system will also prompt you for answers to security questions. Please make a note of your password along with the answers to the security questions because you will not be able to log back in without the correct (case sensitive) ID, password and/or answers. Once registered, you can immediately begin using **Easitrak2013**. Enter your EPA ID number and password on the main page and it will step you through the process.
- > For Returning Filers: please register each reporting year as a new user for each facility EPA ID # and

assign your own password. The system will also prompt you for answers to security questions. Please make a note of these as the system will not allow you to log in without the correct (case sensitive) ID, password and/or security answers. To register for 2013, click the "Registration for Generator", enter each facility EPA ID #, create a new password and select the box at the bottom of the registration form to "download site information from the previous filing" i.e., 2011. Once you register you can immediately begin using *Easitrak2013*.

Facilities with Large Files: Please email your flat files to Easitrak Helpdesk at info@arminc.net who will load them into Easitrak for you. Please keep in mind, if, the formats submitted do not meet the specs for filing the biennial report and your report needs to be manipulated to any extent, Easitrak will charge you for their time and efforts. If you choose to submit your flat files to Easitrak Helpdesk, it will be necessary for you to first register your facility for the 2013 year and completely fill out the SI form! Easitrak Helpdesk will not be able to do this on your behalf.

The final step to completing electronic reporting: Once you have verified the accuracy of your data, you will need to select "Check Data" (top of menu). If your data passes the system edits, you can submit your data to the State of North Carolina. Please print a copy of the "Declaration of Electronic Filing" page found under the "Reports" tab. To complete the 2013 Biennial Hazardous Waste Report process, please have your facility's authorized legal representative sign it and then mail the original to:

Patricia Davalos NC Hazardous Waste Section 1646 Mail Service Center Raleigh, NC 27699-1646

HAZARDOUS WASTE BIENNIAL REPORT REMINDERS ...

- ➤ You will report your **current** Hazardous Waste **Generator Status** as **of the date** of submitting your 2013 Biennial Report on the Site ID Form in Item 10.A.1 Generator of Hazardous Waste. Your current status may be different from the status during the report year that requires you to file the Hazardous Waste Report.
- ➤ To prepare the 2013 Hazardous Waste Report, please consult your records on quantities and types of hazardous waste generated, managed, shipped and/or received in 2013 by your facility. Some records that may prove useful are: (1) Hazardous waste manifest forms; (2) Hazardous Waste Report forms submitted in previous years; (3) Records of quantities of hazardous waste generated or accumulated on-site; (4) Results of laboratory analyses of your waste; (5) Contracts or agreements with off-site facilities managing your wastes; and (6) Copies of permits for on-site waste management systems.
- Please keep a copy of the 2013 Hazardous Waste Report Filing with your company records for at least three years. These reports should be kept in a location readily available for review and inspection should your facility be subject to a Compliance Evaluation Inspection (CEI)

NEED HELP? WHO TO CONTACT

Technical Assistance - Ray Strawbridge at 919 707-8231 Ray.Strawbridge@ncdenr.gov Supervisor, Patricia Davalos - 919 707-8233 Patricia.Davalos@ncdenr.gov